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Proposed Counsel to Navillus Tile, Inc.

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re: : Chapter 11

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NAVILLUS TILE, INC., DBA NAVILLUS : Case No. 17-13162 (SHL) : CONTRACTING :

:

Debtor.

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## NOTICE OF PROPOSED AGENDA OF MATTERS SCHEDULED FOR HEARING ON NOVEMBER 29, 2017 AT 2:00 P.M.

Date and Time: November 29, 2017 at 2:00 p.m. (Prevailing Eastern Time)

Location of Hearing: United States Bankruptcy Court for the

Southern District of New York The Honorable Sean H. Lane

One Bowling Green Courtroom 701

New York, New York 10004-1408

### I. CONTESTED MATTERS

1. Motion of the Debtor for Entry of an Order (A) Authorizing the Debtor to (I) Continue its Cash Management System; (II) Maintain Existing Bank Accounts; (III) Receive a Waiver of Certain Operating Guidelines Relating to Bank Accounts; and (IV) Receive a Waiver of the Requirements of 11 U.S.C. § 345; and (B) Immediately Vacating Certain Restraining Notices and Levy [Docket No. 6]

#### Related Responses:

A. Objection of United States Trustee to Motion of the Debtor for Entry of an Order (A) Authorizing the Debtor to (I) Continue its Cash Management System; (II) Maintain Existing Bank Accounts; (III) Receive a Waiver of Certain Operating Guidelines Relating to Bank Accounts; and (IV) Receive a Waiver of the Requirements of 11 U.S.C. § 345; and (B) Immediately Vacating Certain Restraining Notices and Levy [Docket No. 32]

STATUS: Hearing on this matter will go forward.

2. Motion of the Debtor for Entry of Interim and Final Orders Pursuant to 11 USC 105(a), 362, 363 and 364 of the Bankruptcy Code (I) Authorizing Post-Petition Secured Financing; (II) Granting Security Interests and Superpriority Claims; (III) Authorizing Use of Cash Collateral; and (IV) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(c) [Docket No. 57]

#### **Related Responses:**

- A. Notice of Filing of Exhibit (Docket No. 63)
- B. Limited Objection and Reservation of Rights of Plaintiff Benefit Fund Trustees in Moore v. Navillus Tile, Inc. Regarding Debtor's Motion for Interim and Final Order Approving Post Petition Secured Financing [Docket No. 65]
- C. Reply to Limited Objection of Plaintiff Benefit Fund Trustees in Moore v. Navillus Tile, Inc. to Motion of the Debtor for Entry of Interim and Final Orders Pursuant to 11 USC 105(a), 362, 363 and 364 of the Bankruptcy Code (I) Authorizing Post-Petition Secured Financing; (II) Granting Security Interests and Superpriority Claims; (III) Authorizing Use of Cash Collateral; and (IV) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(c)

STATUS: Hearing on this matter will go forward.

### II. UNCONTESTED MATTERS

Motion of the Debtor for Entry of an Order (I) Authorizing the Debtor to Pay (A)
 Certain Prepetition Employee Obligations and (B) Prepetition Withholding
 Obligations; (II) Authorizing the Debtor to Continue Performing Under the
 Collective Bargaining Agreements; (III) Authorizing the Debtor to Continue to
 Provide Employee Benefit Programs to Non-Union Employees; (IV) Directing
 Banks to Honor Related Prepetition Transfers; and (V) Granting Related Relief
 [Docket No. 8]

STATUS: Final hearing on this matter will go forward.

2. Motion of the Debtor for Entry of An Order Establishing Notice Procedures And A Master Service List [Docket No. 40]

STATUS: Hearing on this matter will go forward.

3. Motion of the Debtor for Entry of an Order (I) Authorizing the Debtor to (A) Continue to Maintain Prepetition Insurance Programs and (B) Pay or Honor Prepetition Obligations Arising Thereunder and (II) Granting Related Relief [Docket No. 49]

STATUS: Hearing on this matter will go forward.

Dated: Garden City, New York November 28, 2017

#### CULLEN AND DYKMAN LLP

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